

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

LOWER SUSQUEHANNA RIVERKEEPER ASSOCIATION,)	
)	
)	
Plaintiff,)	
)	
)	
v.)	Case No. 1:23-cv-00343
)	
FEDERAL HIGHWAY ADMINISTRATION,)	
U.S. Department of Transportation, SHAILEN)	
BHATT, Administrator, Federal Highway)	
Administration, and COMMONWEALTH OF)	
PENNSYLVANIA, DEPARTMENT OF)	
TRANSPORTATION,)	
)	
Defendants.)	
)	

**FEDERAL DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT**

Shaileen P. Bhatt, in his official capacity as the Administrator of the Federal Highway Administration (“FHWA”), FHWA (Administrator Bhatt and FHWA collectively referred to as “Federal Defendants”), hereby move the Court to enter summary judgment in their favor.

Contemporaneous with this motion, the Federal Defendants will file a brief in support and statement of undisputed facts.

Respectfully submitted,

GERARD M. KARAM
United States Attorney

s/ Richard D. Euliss
RICHARD D. EULISS
Assistant U.S. Attorney
DC 999166
1501 N. 6th Street, Box 202
Harrisburg, PA 17102
Phone: (717) 221-4482
Fax: (717) 221-4493
Richard.D.Euliss@usdoj.gov

Dated: April 29, 2024

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

LOWER SUSQUEHANNA
RIVERKEEPER ASSOCIATION,

Plaintiff,

v.

FEDERAL HIGHWAY
ADMINISTRATION, *et al.*,

Defendants.

Civil No. 1:23-CV-00343

(Judge Wilson)

(Electronically Filed)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers. That on April 29, 2024, she served a copy of the attached

**FEDERAL DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT**

by electronic service to the email addresses below:

Kenneth T Kristl, Esq.
Ktkristl@widener.edu

Kenda Gardner, Esq.
Kegardner@pa.gov

Neal Thomas Brofee, Esq.
Nbrophee@pa.gov

s/ Amanda J. Albert
Amanda J. Albert
Legal Administrative Specialist